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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

WUN CHEI CHAO, *et al.*,

Plaintiffs,

v.

UR M. JADDOU, Director, U.S. Citizenship
 and Immigration Services, *et al.*,

Defendant.

C 3:23-cv-00893 LJC

STIPULATION TO DISMISS; ORDER

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties, through their undersigned attorneys, hereby stipulate to dismiss this case on the following terms:

1. Defendant United States Citizenship and Immigration Services (“USCIS”) agrees to take initial adjudicative action – an approval, denial, Request for Evidence (“RFE”), Request for Clarification (“RFC”), or Notice of Intent to Deny (“NOID”) – based on the following schedule:

PRINCIPAL PLAINTIFF	DEADLINE FOR INITIAL ADJUDICATIVE ACTION FROM THE DATE OF THE EXECUTION OF THE VOLUNTARY DISMISSAL
TAN VAN HUYNH	90 days
MAI THI THUY MAI	90 days

BINGZE DU	90 days
LINGLING ZHAN	90 days
YIGIT ILYAS SEFTALI	90 days
DIEN THANH PHAN	90 days
JAICE JACOB	120 days
WUN CHEI CHAO	120 days
YING LI	120 days
MEENU VIKASH SACHAR	120 days
HUI LI	120 days
MEHMET HAKAN KORKMAZ	150 days
YUNLONG GUO	150 days
CAM THUY TRUONG	150 days
YUNJIANG HU	150 days
ASEELA LAMIYA	150 days
ZONGQING SHEN	150 days

2. If, after initial review, USCIS has or does issue to a Plaintiff an RFE, NOID, or RFC, USCIS agrees to take the next adjudicative action within 45 days of receipt of each respective Plaintiff's response to the RFE/NOID/RFC. This 45-day timeframe will apply to any subsequent adjudicative actions, if applicable.

3. Plaintiffs' counsel agrees to notify Defendant's counsel by email within 5 days of submission of a response to an RFE/NOID/RFC and provide Defendant's counsel with the tracking information.

4. If Plaintiffs believe there is a breach of this agreement, Plaintiffs agree to give Defendant's counsel notice and fourteen days to remedy such breach prior to seeking judicial intervention.

5. If Defendant is unable to meet these deadlines for reason out of its control, it agrees to notify counsel for Plaintiffs and Plaintiff's counsel agrees to work in good faith with Defendant to resolve the issue without judicial intervention.

6. The parties agree to bear their own costs and fees.

Dated: April 19, 2023

Respectfully submitted,¹

ISMAIL J. RAMSEY
United States Attorney

/s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney
Attorneys for Defendant

Dated: April 19, 2023

/s/ Bernard P. Wolfsdorf
BERNARD PAVEL WOLFSDORF
Attorney for Plaintiffs

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: April 19, 2023


LISA J. CISNEROS
United States Magistrate Judge

¹ In accordance with Civil Local Rule 5(h)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.